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SDMS Doc ID 165909

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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

(Las Vegas Office)

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Las Vegas, Nevada 89101-1049

March 11, 1999

Ms. Susan M. Crowley
Staff Environmental Specialist
Kerr McGee Chemical LLC
P.O. Box 55
Henderson, NV 89009

RE: Perchlorate Design Assessment for Remedial Action

Dear Ms. Crowley:

The Nevada Division of Environmental Protection (NDEP) has received your Perchlorate Design Assessment for Remedial Action which was submitted to this office on February 9, 1999. This document outlines your proposed plan for a four-part remedial action for perchlorate both on and off-site of the Kerr McGee Chemical LLC facility in Henderson. Based on a review of this document and a meeting held on March 3, 1999, the Division has the following comments.

The Division concurs with the continued interception of perchlorate-impacted groundwater beneath the facility and use of the 11-acre basin for temporary storage and evaporation. The estimated removal of 1200 lbs/day of perchlorate from the shallow groundwater system is very encouraging.

Additionally, the Division understands that biological perchlorate reduction has proven to be the most effective remedial technology currently available. To that end, your plan proposes to initiate engineering and design work for a biological reduction process for groundwater currently intercepted on-site. The Division is very concerned with perchlorate-impacted groundwater that has migrated off of the Kerr McGee property and is beyond the reach of the interception system currently in place. For that reason, the Division believes that engineering and design work for interception and treatment of perchlorate-impacted groundwater at the Pittman Lateral should be initiated prior to focusing on treatment of the water intercepted and contained in the on-site impoundment. As we discussed on March 3, 1999, an option to consider would be location of a perchlorate reduction facility on-site to treat water intercepted at the Pittman Lateral. This would allow for a more immediate removal of perchlorate from the system as close to the Las Vegas Wash as possible.

The Division is aware that there are concerns with the potential discharge of water which has been treated for perchlorate but may contain elevated levels of TDS and other contaminants. In order to expedite perchlorate removal, the Division will consider a discharge plan that involves reinjection of

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treated groundwater at an up gradient location as long as Kerr McGee can demonstrate hydraulic control over this water and can ensure that it will not migrate to Las Vegas Wash.

Lastly, the Division strongly encourages initiation as soon as possible of the activities proposed for completing the understanding of the hydrologic system between the Kerr McGee facility and the Pittman Lateral such as additional pump tests. A complete understanding of the subsurface hydrology will allow for a more effective treatment once a remedial technology is selected and installed.

A revised Remedial Action plan which addresses the issues presented in this letter should be submitted for our review and approval by April 5, 1999. The plan should contain a schedule which shows interception of perchlorate impacted water at the Pittman Lateral no later than the third quarter of 1999.

Please feel free to contact me at (702) 486-2857 if you have any questions concerning this matter.

Sincerely,



Brenda Pohlmann
Remedial Action Program Supervisor
Las Vegas Bureau of Corrective Actions

BLP:blp

cc: Doug Zimmerman, Chief, Bureau of Corrective Actions
Kevin Mayer, USEPA, 75 Hawthorne Street, H-6-4, San Francisco, CA 94105
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